

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA
ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR-PHK

MDL No. 3047

**STIPULATION REGARDING CORRECTED
[PROPOSED] THIRD MODIFIED
PROTECTIVE ORDER**

This Document Relates to:

ALL SCHOOL DISTRICT ACTIONS

[Dkt. 1195]

WHEREAS, this Court entered the Stipulated Second Modified Protective Order on March 4, 2024. (Dkt. No. 665).

WHEREAS, after hearing arguments from both sides at a Discovery Management Conference on September 12, 2024 (“DMC”), the Court ordered that the parties meet and confer to address production of documents and materials under The Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g, and its implementing regulations (34 C.F.R. part 99).

WHEREAS, the parties met and conferred following the DMC and modified the Stipulated Second Modified Protective Order to include a new “Section 14. Redactions or Designations of Highly Confidential (SII) – Attorneys’ Eyes-Only Material (Educational Records Containing Student Individually Identifiable Information),” and other related modifications to Sections 2.7, 2.18, 2.20, 2.23, 5.1, 5.5, 7.3, 7.5, 7.6, 8.1, and 8.3.

WHEREAS, the parties filed a Proposed Third Modified Protective Order on October 4, 2024 (Dkt. No. 1195) that contained an inadvertent error that the parties now seek to correct.

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ATTESTATION

I, Geoffrey M. Drake, hereby attest, pursuant to N.D. Cal. Civil L.R. 5–1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: October 10, 2024

By: /s/ Geoffrey M. Drake
Geoffrey M. Drake